Message

From: LaPoma, Jennifer [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=CBC6070A1891487D8F80A229B98AFFB2-LAPOMA, JENNIFER]

Sent: 1/9/2018 7:09:36 PM

To: Garland, Edward [Edward.Garland@hdrinc.com]

CC: Salkie, Diane [Salkie.Diane@epa.gov]; Franklin Beth (Elizabeth.A.Franklin@usace.army.mil)

(Elizabeth.A.Franklin@usace.army.mil) [Elizabeth.A.Franklin@usace.army.mil]; Scott Kirchner

[kirchnersf@cdmsmith.com]; Frantz, Aaron [FrantzAR@cdmsmith.com]; Wands, James [James.Wands@hdrinc.com]

Subject: RE: bullets on IR presentation to send to CPG

Thank you Ed.

Just sent these items over to CPG.

From: Garland, Edward [mailto:Edward.Garland@hdrinc.com]

Sent: Tuesday, January 09, 2018 12:37 PM

To: LaPoma, Jennifer <LaPoma.Jennifer@epa.gov>

Cc: Salkie, Diane <Salkie.Diane@epa.gov>; Franklin Beth (Elizabeth.A.Franklin@usace.army.mil) (Elizabeth.A.Franklin@usace.army.mil) <Elizabeth.A.Franklin@usace.army.mil); Scott Kirchner

<kirchnersf@cdmsmith.com>; Frantz, Aaron <FrantzAR@cdmsmith.com>; Wands, James <James.Wands@hdrinc.com>

Subject: bullets on IR presentation to send to CPG

Jen,

Below are some bullets for your consideration for passing to the CPG regarding presentation material for the Upper 9-mile Interim Remedy:

Based on our November 29, 2017 conference call regarding the Interim Remedy presentation material prepared by the CPG for discussions with a limited number of CSTAG members and representatives of the Partner Agencies, we were expecting to receive updates to the CPG's analyses supporting the Interim Remedy proposal. EPA realizes that the CPG has been busy preparing RI report chapters, but we want to make sure the following items don't fall off your radar.

- 1. For the evaluation of spatially varying RALs, the analysis should be made consistent with the approach of representing remediation (or no remediation) of entire DU's, as was done for the evaluation of spatially constant RALs. The approach of representing remediation of partial DU's for the spatially varying RALs lead to an apples-to-oranges comparison between the spatially constant and spatially varying RAL results.
- 2. As discussed previously the comparison among RALs should also be revised to incorporate the case where a RAL of 200 ppt is applied throughout the RM 8 to 14.7 reach.
- 3. As mentioned in several discussions, the scaling of Human Health risk based on the ratio of forecast-to-current 17-mile SWACs overstates the potential reduction for species not exposed to sediments over the entire 17-mile LPR. EPA is expecting the revised analysis discussed on November 29th which would be based on for species-appropriate SWACs.
- 4. EPA would also appreciate clarification of the CPG's thought on varying depths of dredging mentioned in the November 27, 2017 document, "Upper 9-Mile Plan A Proposal to Expedite Cleanup of the 17-Mile LPRSA" and again in our January 4th web-meeting regarding FS modeling. For instance, possible interpretations have included varying depth based on varying cap types (which would keep the same footprint), or applying a RAL to concentrations over deeper depth intervals (which could expand the remediation footprint).

Ed

Edward Garland, P.E.

Senior Professional Associate | Manager Water Quality Modeling

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